

EXHIBIT B

**DETAILED INVOICE OF FEES AND EXPENSES FOR
DECEMBER 9, 2024 THROUGH AND INCLUDING DECEMBER 31, 2024**

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MICHAEL J. WARELL
 909 THIRD AVENUE
 30TH FLOOR
 NEW YORK, NY 10022
 ATTN: DAVID ORLOFSKY

Invoice Number 2138436
 Invoice Date 02/28/25
 Client Number 109258
 Matter Number 0001

Re: INDEPENDENT DIRECTOR OF FREEDOM VCM INTERCO, INC. AND FREEDOM VCM, INC.

FOR PROFESSIONAL SERVICES RENDERED:

MATTER SUMMARY OF TIME BILLED BY TASK :

		<u>HOURS</u>	<u>VALUE</u>
0002	Case Administration	85.50	\$124,662.50
0003	Akin Gump Fee Application/Monthly Billing Reports	0.60	\$597.00
0006	Retention of Professionals	198.40	\$210,781.50
0008	Hearings and Court Matters/Court Preparation	53.80	\$96,835.00
0010	DIP, Cash Collateral Usage, Adequate Protection and Exit Financing	5.20	\$9,922.00
0020	Investigation and Discovery Matters	232.50	\$318,252.00
0022	Disclosure Statement/Solicitation/Plan/Confirmation	35.10	\$44,258.50
0025	Travel time	5.40	\$11,171.00
0028	Corporate Governance and Board Matters	6.30	\$13,190.50
0031	Business Operations	0.20	\$439.00
0033	Other Contested Matters	3.00	\$3,305.00
TOTAL		626.00	\$833,414.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/06/24	M S STAMER	0002	Review case materials (.3); calls with B. Kahn re case background (.5); correspondence with debtors' professionals (.2); call with debtors' counsel re background (.2).	1.20	\$2,634.00
12/06/24	B M KAHN	0002	Calls with M. Stamer re: case background (.5); call with T. Helfrick re: same (.2); review first day declaration (.7), various filed pleadings (1.0) and consider next steps (.4).	2.80	\$5,530.00
12/06/24	B M KAHN	0006	Review draft of Akin engagement letter.	0.80	\$1,580.00
12/06/24	T L HELFRICK	0002	Review First Day Declaration (2.0); call with B. Kahn re case background (.2).	2.20	\$2,189.00
12/06/24	T L HELFRICK	0022	Review motion to terminate exclusivity.	0.30	\$298.50
12/07/24	B M KAHN	0028	Review and comment on Wartell director engagement letter.	1.70	\$3,357.50
12/07/24	A E LUFT	0022	Review exclusivity termination pleadings.	1.80	\$3,555.00
12/07/24	T L HELFRICK	0022	Review exclusivity termination filings (2.5) and draft summary of same (1.8); correspondence with Akin team re same (.5); review RSA and related materials (2.0).	6.80	\$6,766.00
12/07/24	T L HELFRICK	0002	Review docket (.1) and correspondence re relevant filings (.1).	0.20	\$199.00
12/08/24	M S STAMER	0002	Review various filed pleadings (3.0); calls with B. Kahn re case issues (.3).	3.30	\$7,243.50
12/08/24	B M KAHN	0002	Call with M. Stamer re case issues (.3); call with A. Antypas re: case background (.3).	0.60	\$1,185.00
12/08/24	B M KAHN	0006	Analyze retention structure issues.	0.30	\$592.50
12/08/24	B M KAHN	0028	Review corporate organizational documents.	0.70	\$1,382.50
12/08/24	A F ANTYPAS	0002	Call with B. Kahn re case background (.3); review case background materials (.3); correspond with T. Helfrick re same (.2).	0.80	\$1,116.00
12/08/24	T L HELFRICK	0002	Prepare work product re professionals (1.1); correspondence with A. Antypas re same (.1); continue reviewing background case materials (.9).	2.10	\$2,089.50
12/09/24	M S STAMER	0002	Review case background materials (2.3); correspondence with S. Kuhn and M. Wartell re case (.6); calls with S. Kuhn and	3.50	\$7,682.50

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/09/24	S B KUHN	0002	M. Wartell re same (.6). Correspondence with M. Stamer and M. Wartell re case (.6); calls with M. Stamer and M. Wartell re same (.6).	1.20	\$2,634.00
12/09/24	S B KUHN	0028	Review director engagement documents (.6) and revisions to same (.3); correspondence with Willkie team re same (.4); review Freedom VCM & VCM Interco organizational documents (1.5) and draft internal correspondence re same (.4).	3.20	\$7,024.00
12/09/24	B M KAHN	0008	Attend call with Akin team re hearing preparation.	0.60	\$1,185.00
12/09/24	B M KAHN	0010	Review DIP pleadings.	1.80	\$3,555.00
12/09/24	A E LUFT	0008	Attend call with Akin team re: hearing preparation (.6); discuss hearing preparation and logistics with T. Helfrick (.5); review pleadings for second day hearing (5.4).	6.50	\$12,837.50
12/09/24	T L HELFRICK	0002	Revise work product re case professionals (.3) and correspondence with A. Antypas re same (.1); review recent filings (.3) and internal correspondence re same (.2); draft pleading summaries (1.5).	2.40	\$2,388.00
12/09/24	T L HELFRICK	0006	Review draft Akin engagement letter (.6) and analyze retention issues (.4).	1.00	\$995.00
12/09/24	T L HELFRICK	0008	Prepare materials for upcoming hearing (3.3) and correspondence to Akin team re same (.5); attend call with Akin team re: hearing preparation (.6); discuss hearing preparation and logistics with A. Luft (.5).	4.90	\$4,875.50
12/10/24	M S STAMER	0008	Review relevant materials in prep for hearing (.8); attend second day hearing (7.9).	8.70	\$19,096.50
12/10/24	M S STAMER	0002	Attend call (.3) and correspond with client (.4) re case updates.	0.70	\$1,536.50
12/10/24	M S STAMER	0025	Traveling to and from hearing (actual time 4.5).	2.30	\$5,048.50
12/10/24	S B KUHN	0008	Correspondence with Akin team re hearing updates.	0.70	\$1,536.50
12/10/24	S B KUHN	0006	Correspondence with B. Kahn, client, and Willkie team re engagement letter (.3); analyze issues re: engagement (.5).	0.80	\$1,756.00
12/10/24	B M KAHN	0022	Analyze RSA issues.	0.40	\$790.00
12/10/24	B M KAHN	0010	Review and comment on DIP order language (.4); review Akin team correspondence re: same (.2).	0.60	\$1,185.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/10/24	B M KAHN	0008	Telephonic attendance at second day hearing (partial) (1.5); correspondence with Akin team re: same (.3).	1.80	\$3,555.00
12/10/24	B M KAHN	0006	Correspondence with S. Kuhn, client, and Willkie team re Akin engagement letter.	0.30	\$592.50
12/10/24	A F ANTYPAS	0008	Review and edit hearing summary.	1.00	\$1,395.00
12/10/24	A F ANTYPAS	0002	Confer with T. Helfrick re case updates.	0.20	\$279.00
12/10/24	A E LUFT	0010	Review DIP pleadings.	2.20	\$4,345.00
12/10/24	A E LUFT	0008	Attend second day hearing.	7.90	\$15,602.50
12/10/24	A E LUFT	0025	Travel from hearing (actual time 2.2).	1.10	\$2,172.50
12/10/24	T L HELFRICK	0002	Confer with A. Antypas re case updates (.2); review docket updates (.2) and correspondence with Akin team re same (.1).	0.50	\$497.50
12/10/24	T L HELFRICK	0008	Prepare hearing summary (.8); revise same (.6) correspond with Akin team re same (.4); correspond with client re same (.2).	2.00	\$1,990.00
12/10/24	T L HELFRICK	0006	Research issues in connection with retention applications.	0.60	\$597.00
12/11/24	M S STAMER	0008	Review relevant materials in preparation for day 2 of second day hearing (.5) and attend same (.9) (partial).	1.40	\$3,073.00
12/11/24	M S STAMER	0002	Attend Akin team meeting re case workstreams (.5); correspondence with M. Wartell and Willkie re various case issues (.3).	0.80	\$1,756.00
12/11/24	S B KUHN	0002	Attend Akin team meeting re case workstreams (.5); correspondence with Willkie re final unanimous written consents (.1).	0.60	\$1,317.00
12/11/24	S B KUHN	0008	Correspondence with Akin team re follow up matters.	0.50	\$1,097.50
12/11/24	B R KEMP	0006	Confer with A. Laaraj re conflict review process.	0.20	\$106.00
12/11/24	J F NEWDECK	0006	Begin draft shell of retention application (1.1); correspondence with Akin team re same (.4); review PII list from debtors' counsel (.3); correspondence with paralegal team re same (.2); review first day declaration in connection with preparing for retention application (.4); analyze initial matters in connection with same (.5).	2.90	\$4,785.00
12/11/24	B M KAHN	0002	Attend Akin team meeting re case workstreams (.5); analyze	1.20	\$2,370.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/11/24	B M KAHN	0006	next steps (.7). Review updates re: engagement and retention.	0.60	\$1,185.00
12/11/24	B M KAHN	0008	Attend second day hearing (partial).	0.50	\$987.50
12/11/24	A F ANTYPAS	0022	Email Akin team re plan issues (.5); review and analyze RSA (.8).	1.30	\$1,813.50
12/11/24	A F ANTYPAS	0006	Correspondence with Akin team re Akin retention application (.4); correspond with T. Helfrick re same (.2); call with T. Helfrick re same (.3); correspond with A. Laaraj re conflicts check (.4).	1.30	\$1,813.50
12/11/24	A F ANTYPAS	0010	Review DIP Order.	0.60	\$837.00
12/11/24	A F ANTYPAS	0002	Continue to review first day declaration (1.3); correspond with T. Helfrick re case workstreams (.5); attend Akin team meeting re case workstreams (.5).	2.30	\$3,208.50
12/11/24	A LAARAJ	0006	Confer with B. Kemp re conflicts review process (.2); prepare unredacted schedule one (1.5); research names on schedule one (.4); correspond with A. Antypas re conflicts check (.4).	2.50	\$1,325.00
12/11/24	A E LUFT	0002	Attend Akin team meeting re case workstreams (.5); draft list of action items (.3).	0.80	\$1,580.00
12/11/24	A E LUFT	0008	Review pleadings and transcripts in preparation for hearing (5.3) and analyze issues in connection therewith (2.0); attend hearing (1.0).	8.30	\$16,392.50
12/11/24	M N TANNA	0006	Conduct conflicts check.	1.30	\$396.50
12/11/24	T L HELFRICK	0002	Review docket updates (.7), draft summaries of same (1.1) and draft correspondence to Akin team re same (.1); attend Akin team call re case workstreams (.5); emails with A. Antypas re same (.5); email Akin team re case matters (.3).	3.20	\$3,184.00
12/11/24	T L HELFRICK	0008	Prepare hearing materials (1.0); consider related issues (.3).	1.30	\$1,293.50
12/11/24	T L HELFRICK	0006	Correspondence with Akin team re Akin retention application (.4); correspond with A. Antypas re same (.2); call with A. Antypas re same (.3); draft Akin engagement letter (1.1).	2.00	\$1,990.00
12/12/24	M S STAMER	0002	Calls with counsel to debtors re case issues (.2); correspondence	2.10	\$4,609.50

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/12/24	S B KUHN	0002	with S. Kuhn and M. Wartell re next steps (.5); attend meeting with B. Kahn, S. Kuhn, A. Luft and M. Wartell (1.4).		
12/12/24	B M KAHN	0002	Correspondence with M. Stamer and M. Wartell re next steps (.5); attend meeting with M. Stamer, B. Kahn, A. Luft and M. Wartell re case status and next steps (1.4); review background materials (1.3).	3.20	\$7,024.00
12/12/24	B M KAHN	0006	Attend meeting with M. Stamer, S. Kuhn, A. Luft and M. Wartell re next steps (partial).	1.00	\$1,975.00
12/12/24	B M KAHN	0006	Review and comment on Akin engagement letter draft.	0.50	\$987.50
12/12/24	D K KRASA	0006	Confer with A. Laaraj re conflicts check (.5); review parties-in-interest list (.5).	1.00	\$530.00
12/12/24	R TIZRAVESH	0020	Call with A. Luft re investigation issues (.5); review documents re investigation (1.6).	2.10	\$3,465.00
12/12/24	M L BRIMMAGE JR.	0020	Review and analyze background facts and documents related to investigation (.9) and disputed issues (1.3); call with A. Luft re workstream statuses and investigation strategy (.4); analyze issues in connection with investigation (.2).	2.80	\$6,146.00
12/12/24	A F ANTYPAS	0002	Correspondence with T. Helfrick re workstreams (.6); review recently filed pleadings (.6).	1.20	\$1,674.00
12/12/24	A F ANTYPAS	0006	Review precedent independent director engagement agreements (.7); review and comment on draft Akin engagement letter (1.1); call with T. Helfrick re same (.3); correspondence with T. Helfrick re same (.5); correspondence with Akin team re same (.4); review and edit revised draft of Akin engagement letter (.3).	3.30	\$4,603.50
12/12/24	A LAARAJ	0006	Confer with D. Krasa re conflicts review process (.5); review and comment on Willkie category lists in connection with conflicts review (.4) and prepare category emails for conflicts (1.1); prepare conflicts master review summary (1.0).	3.00	\$1,590.00
12/12/24	A E LUFT	0020	Call with M. Brimmage re the status of various case issues (.4); call with R. Tizravesh investigation matters (.5); correspondence with Akin team re same (.9).	1.80	\$3,555.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/12/24	A E LUFT	0002	Meeting with client, M. Stamer, B. Kahn and S. Kuhn re: next steps.	1.40	\$2,765.00
12/12/24	M N TANNA	0006	Compile information for conflicts check (.8); compile information from 2019 Statements (.3); conduct conflicts check review (1.8).	2.90	\$884.50
12/12/24	T L HELFRICK	0002	Review various filed pleadings (.9); email with A. Antypas re same (.2); review first day filings in connection with review of case issues (1.2); draft WIP task list (1.1); prepare case update materials (1.1); correspondence with A. Antypas re case matters (.6).	5.10	\$5,074.50
12/12/24	T L HELFRICK	0006	Revise draft Akin engagement letter (.6); call with A. Antypas re same (.3); emails with same re same (.5); emails with Akin team re same (.5).	1.90	\$1,890.50
12/13/24	M S STAMER	0020	Call with D. Sinclair and A. Luft re: investigation (.3); calls (.5) and correspondence (.4) with client and company representatives re same.	1.20	\$2,634.00
12/13/24	M S STAMER	0002	Review filed pleadings and related materials re case status.	0.80	\$1,756.00
12/13/24	S B KUHN	0020	Correspondence with Akin team re follow-up items & next steps re investigation (.7); continue reviewing background documents re same (1.0).	1.70	\$3,731.50
12/13/24	S B KUHN	0028	Correspondence with M. Wartell re director engagement letter.	0.20	\$439.00
12/13/24	B R KEMP	0006	Review conflict reports for certain categories (1.2); analyze data (1.8); review issues related to same (.8); update summary chart (.4); correspond with J. Newdeck re PII names (.3).	4.50	\$2,385.00
12/13/24	J F NEWDECK	0006	Analyze issues in connection with Akin retention (.6); attend call with Akin team re: same (.4); conduct research re same (1.0); draft correspondence to team re same (.5); draft sections of Akin retention application (1.8); emails with B. Kemp re PII review (.3).	4.60	\$7,590.00
12/13/24	B M KAHN	0006	Review updates re: engagement and retention matters (1.0); attend call with Akin team re: same (.4); review potential issues re: local counsel (.3).	1.70	\$3,357.50
12/13/24	B M KAHN	0020	Call with A. Luft re: investigation status.	0.20	\$395.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/13/24	D K KRASA	0006	Review parties-in-interest list (.8); review conflicts reports (1.5).	2.30	\$1,219.00
12/13/24	R TIZRAVESH	0020	Call re case status and strategy with P. Glackin (.3); review materials re investigation issues (4.9); review correspondence from litigation team re same (.1).	5.30	\$8,745.00
12/13/24	M L BRIMMAGE JR.	0020	Correspondence with Akin team re the status of various issues (.3); review and analyze deposition transcripts (1.8).	2.10	\$4,609.50
12/13/24	A F ANTYPAS	0002	Correspond with A. Luft and B. Kahn re client query (.3); call with T. Helfrick re same (.2); review filed pleadings (.5); review and comment on draft WIP task list (.5); correspond with T. Helfrick re same (.3); review case background materials (1.2); call with T. Helfrick re case workstreams (.3).	3.30	\$4,603.50
12/13/24	A F ANTYPAS	0006	Review and edit revised draft of Akin engagement letter (.6); attend call with Akin team re: same (.4); correspond with T. Helfrick re same (.2); correspond with Akin team re same (.3); review PII list and structure chart in connection with same (.4).	1.90	\$2,650.50
12/13/24	P J GLACKIN	0020	Call with R. Tizravesh re case status and strategy (.3); review matter background materials (.9).	1.20	\$1,620.00
12/13/24	A LAARAJ	0006	Call with T. Helfrick re opening FRG matter (.1); review conflicts reports (3.5).	3.60	\$1,908.00
12/13/24	A E LUFT	0020	Update call with B. Kahn re: investigation (.2); call with D. Sinclair and M. Stamer re: same (.3).	0.50	\$987.50
12/13/24	A E LUFT	0002	Edit draft communication to client re case updates.	0.10	\$197.50
12/13/24	A E LUFT	0006	Edit draft Akin engagement letter.	0.30	\$592.50
12/13/24	M N TANNA	0006	Conduct conflicts check review.	1.00	\$305.00
12/13/24	T L HELFRICK	0002	Prepare case materials in connection with matter administration (.8) and correspondence with Akin team re same (.4); call with A. Antypas re case workstreams (.3); revise WIP list (1.5); emails with A. Antypas re same (.3); review docket updates (.5) and draft correspondence to Akin	5.90	\$5,870.50

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/13/24	T L HELFRICK	0006	team re same (.2); draft case calendar tracker (1.4); draft working group list (.3); call with A Antypas re client query (.2). Revise draft of Akin engagement letter (.8); correspondence with A. Antypas re retention matters (.7); attend call with Akin team re: same (.4); call with A. Laaraj re FRG matter (.1).	2.00	\$1,990.00
12/16/24	S B KUHN	0002	Continued review of case background documents.	1.50	\$3,292.50
12/16/24	J F NEWDECK	0006	Analyze conflict reports in connection with retention matters (.7); draft correspondence to Akin team members re follow up information (.6); analyze screening matters (.7); correspondence with Akin team re same (.2); draft disclosures for Akin declaration (2.5); draft portions of retention application (1.8).	6.50	\$10,725.00
12/16/24	B M KAHN	0006	Review and comment on draft Akin engagement letter (.9); review retention application issues (.9); correspondence with Akin team re: same (.3); analyze local counsel retention issues (.3).	2.40	\$4,740.00
12/16/24	R TIZRAVESH	0020	Review documents and materials re investigation (2.9) and analyze issues in connection therewith (1.0); draft investigation outline (1.0); emails with Akin team re same (.3).	5.20	\$8,580.00
12/16/24	M L BRIMMAGE JR.	0020	Correspondence with Akin team re the status of various open issues (.3); review and analysis of deposition transcripts (1.2).	1.50	\$3,292.50
12/16/24	A F ANTYPAS	0002	Review draft case calendar (.3); review DIP order in connection with same (.2); correspond with T. Helfrick re case work streams (.3).	0.80	\$1,116.00
12/16/24	A F ANTYPAS	0008	Review pleadings in advance of December 17 hearing.	1.00	\$1,395.00
12/16/24	A F ANTYPAS	0006	Correspondence with Akin team re retention application and conflict check matters (.8); follow up correspondence with T. Helfrick re same (.2); review and comment on revised draft Akin engagement letter (.4).	1.40	\$1,953.00
12/16/24	P J GLACKIN	0020	Correspondence with Akin team re investigation issues.	0.20	\$270.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/16/24	A LAARAJ	0006	Continue conflicts review (1.0); prepare schedules 2 and 3 (.5).	1.50	\$795.00
12/16/24	T L HELFRICK	0002	Prepare case calendar (.6) and correspondence with A. Antypas and team re same (.5); review recent filings (.9) and prepare summaries of same (.6).	2.60	\$2,587.00
12/16/24	T L HELFRICK	0006	Review and revise draft Akin engagement letter (.8) and emails with A. Antypas re retention matters (.7).	1.50	\$1,492.50
12/16/24	T L HELFRICK	0008	Prepare materials for December 17 hearing.	0.50	\$497.50
12/17/24	M S STAMER	0002	Review case materials (.4); communications with debtors' professionals re case issues (.2) and communications with 1L professionals re case issues (.2).	0.80	\$1,756.00
12/17/24	S B KUHN	0008	Correspondence with Akin team re hearing follow up.	0.30	\$658.50
12/17/24	J F NEWDECK	0006	Review reports for certain PII categories (.3); correspondence to conflict review team re review process (.6); analyze draft schedules and related conflict reports (2.8); correspondence with review team re same (.2); continue to analyze draft schedules and related conflict reports (.9).	4.80	\$7,920.00
12/17/24	B M KAHN	0002	Review status of case workstreams (.2); correspondence with Akin team re: updates (.2).	0.40	\$790.00
12/17/24	B M KAHN	0020	Review common interest agreement matters (.4); analyze investigation open issues (.5) and correspondence with Akin team re same (.2); communications with Akin Lit team re investigation strategy (.4).	1.50	\$2,962.50
12/17/24	B M KAHN	0006	Review comments to draft Akin engagement letter.	0.50	\$987.50
12/17/24	B M KAHN	0008	Telephonic attendance at December 17 hearing (partial).	0.50	\$987.50
12/17/24	B M KAHN	0028	Review written board consent matters.	0.50	\$987.50
12/17/24	D K KRASA	0006	Review conflicts reports (1.1); analyze data (.6); research additional company information (.5); update conflicts review summary chart (.5); draft detailed correspondence to conflicts review team re follow up question re review (.2).	2.90	\$1,537.00
12/17/24	R TIZRAVESH	0020	Review and analyze various materials in connection with	1.60	\$2,640.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/17/24	A F ANTYPAS	0008	investigation (.4); draft outline re investigation (1.2). Review and comment on hearing summary (.3); correspond with Akin team re same (.6).	0.90	\$1,255.50
12/17/24	A F ANTYPAS	0022	Review filed Plan (1.0); correspondence to T. Helfrick re exclusivity issues (.5).	1.50	\$2,092.50
12/17/24	P J GLACKIN	0020	Draft correspondence to Akin team members re case and strategy (.8) and review correspondence from Akin team re same (.3).	1.10	\$1,485.00
12/17/24	A LAARAJ	0006	Update the master conflicts spreadsheet (.3); create project folders (.2); update schedules 2 and 3 (.3); review conflicts categories (3.3); address research questions from J. Newdeck re conflicts review (1.2).	5.30	\$2,809.00
12/17/24	A E LUFT	0020	Communications with Akin team re investigation discovery.	0.60	\$1,185.00
12/17/24	A E LUFT	0025	Travel to and from Delaware for hearing (actual time 4).	2.00	\$3,950.00
12/17/24	A E LUFT	0008	Attend December 17 hearing.	2.70	\$5,332.50
12/17/24	M N TANNA	0006	Continue conflicts check review.	0.50	\$152.50
12/17/24	T L HELFRICK	0002	Correspondence with Akin team re case workstreams (.4); review relevant reporting and docket updates (.7); prepare materials re same (.6).	1.70	\$1,691.50
12/17/24	T L HELFRICK	0008	Draft (.8) and revise (.5) hearing summary; review relevant hearing material (.3) and correspondence with Akin team re same (.2).	1.80	\$1,791.00
12/18/24	M S STAMER	0020	Correspondence with Akin team re investigation strategy (.6); call with Akin team re investigation open issues (.5); correspondence with Akin team re same (.7).	1.80	\$3,951.00
12/18/24	S B KUHN	0002	Prepare for (.2) and attend call with Akin team re case status and next steps (.5).	0.70	\$1,536.50
12/18/24	J F NEWDECK	0006	Draft correspondence to Akin team re retention matters updates (.4); continue to draft retention pleadings (1.5); review related precedent (1.2).	3.10	\$5,115.00
12/18/24	B M KAHN	0002	Attend Akin team call re case status and next steps.	0.50	\$987.50
12/18/24	B M KAHN	0006	Review updates re: Akin retention application (.7); analyze issues in connection with local counsel retention (.3).	1.00	\$1,975.00
12/18/24	B M KAHN	0020	Call with A. Luft re: investigation workstreams.	0.40	\$790.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/18/24	D K KRASA	0006	Review conflicts reports (1.7); analyze data (1.0); research additional company information (.8); update conflicts review summary chart (.7); draft detailed correspondence to conflicts review team re follow up question re review (.2).	4.40	\$2,332.00
12/18/24	R TIZRAVESH	0020	Correspondence with Akin litigation and FR teams re investigation (.3); analyze various issues re investigation (2.1); attend pre-call with Akin team re call with Debtors (.5); call with Debtors re investigation scope (.7).	3.60	\$5,940.00
12/18/24	M L BRIMMAGE JR.	0020	Review and analyze materials in preparation for call with debtors' counsel re investigation matters (.3); call with Akin litigation team re the scope of investigation (.5); call with debtors' counsel re same (.7); analyze discovery issues in connection with investigation (.2).	1.70	\$3,731.50
12/18/24	A F ANTYPAS	0002	Prepare draft agenda for Akin team call (.3); email B. Kahn re same (.2); call with T. Helfrick re case work streams (.8); attend Akin team update call re case status and next steps (.5) and correspondence with Akin team re same (.3).	2.10	\$2,929.50
12/18/24	A F ANTYPAS	0022	Review plan and disclosure statement (1.6); review exclusivity hearing transcript (.3); review internal correspondence from T. Helfrick re same (.2).	2.10	\$2,929.50
12/18/24	A F ANTYPAS	0006	Review and edit revised draft of Akin engagement letter (.2); correspond with T. Helfrick re same (.2).	0.40	\$558.00
12/18/24	P J GLACKIN	0020	Confer with A. Luft re case status and investigation strategy (.7); pre-call with litigation team re scope of investigation (.5); call with debtors' counsel re same (.7); draft document review protocol (1.5).	3.40	\$4,590.00
12/18/24	A LAARAJ	0006	Address research questions re conflicts review (.8); update schedules re same (4.0).	4.80	\$2,544.00
12/18/24	A E LUFT	0020	Attend Akin team call re investigation scope (.5); call with Debtors re same (.7); review call summary and	3.20	\$6,320.00

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12/18/24	A E LUFT	0002		correspondence in connection therewith (.9); call with B. Kahn re: next steps (.4); confer with P. Glackin re: investigation (.7). Attend Akin team update call re case status and next steps.
12/18/24	T L HELFRICK	0033		Prepare Freedom Lender appellate timeline summary (1.0) and draft correspondence to Akin team re same (.2).
12/18/24	T L HELFRICK	0022		Review Plan and RSA (1.1); correspondence with A. Antypas re exclusivity issues (.3); draft Plan summary (1.0).
12/18/24	T L HELFRICK	0006		Correspondence with Akin team re retention matters (1.2); revise Akin engagement letter (.5) and correspondence A. Antypas re same (.2).
12/18/24	T L HELFRICK	0002		Call with A. Antypas re case work streams (.8); attend Akin team call re case status and next steps (.5); review recent filings (.8) and prepare summaries of same (1.1); emails with Akin team re next steps (.4).
12/19/24	M S STAMER	0020		Review relevant materials in connection with investigation (.4); correspondence with Akin team and M. Wartell re same (.8); call with debtors' professionals re investigation (.5).
12/19/24	M R MORSE	0020		Configure litigation support workspace for investigation review (.6); download production documents from Willkie (2.7).
12/19/24	P G O'BRIEN	0020		Call with R. Tizravesh re discovery process (.3); review background documents (.3); confer with T. Whitney re investigation background (.4).
12/19/24	J F NEWDECK	0006		Continue to analyze potential issues in connection with retention matters (3.7); follow up correspondence with team re same (.5).
12/19/24	B M KAHN	0020		Analyze investigation issues (.4); attend call with Akin and Willkie teams re: investigation issues (.5); follow up with A. Luft re: same (.3); consider next steps in connection with investigation strategy (.3).
12/19/24	D K KRASA	0006		Confer with A. Laaraj re conflicts review questions (.5); review J. Newdeck's follow up

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/19/24	R TIZRAVESH	0020	questions re review (.5); research additional company information (.5).	3.80	\$6,270.00
12/19/24	M L BRIMMAGE JR.	0020	Review and analyze search terms re investigation (.1); call with Akin team and Debtors re investigation issues (.5); draft summary of call with Debtors (.3); draft work product in connection with investigation (.8); call with P. O'Brien re investigation discovery (.3); review various documents re investigation (1.8).	1.40	\$3,073.00
12/19/24	A F ANTYPAS	0002	Review and analyze materials in preparation for call with Debtors (.6); call with Debtors and Akin team re investigation issues (.5); prepare and review work product in connection with investigation (.2) and related correspondence (.1).	0.40	\$558.00
12/19/24	A F ANTYPAS	0006	Initial review of draft Akin retention application (.8); correspond with Akin team re retention and conflicts check matters (.4).	1.20	\$1,674.00
12/19/24	A F ANTYPAS	0022	Review Plan, RSA and related materials (2.4); review and revise draft Plan summary (1.8); correspond with T. Helfrick re same (.4).	4.60	\$6,417.00
12/19/24	A F ANTYPAS	0033	Review and edit draft update to Akin team re Freedom Lender appeal briefing (.5); email T. Helfrick re same (.3).	0.80	\$1,116.00
12/19/24	P J GLACKIN	0020	Confer with A. Stamboulidis re background information (.4); correspondence with Akin litigation team re document review protocol and related issues (1.7); correspondence with debtors' counsel re document production and discovery issues (.7); correspondence with Akin's E Discovery team re incoming document productions and related issues (.9); review protective order in connection therewith (.4).	4.10	\$5,535.00
12/19/24	A LAARAJ	0006	Update Schedule 1 (.4); review and update schedules 2 and 3 (.4); review reports and update master summary (3.1); confer with D. Krasa re conflicts review	4.40	\$2,332.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/19/24	A G STAMBOULIDIS	0020	questions (.5). Confer with P. Glackin re background information (.4); review First Day Declaration (1.3).	1.70	\$1,428.00
12/19/24	A E LUFT	0020	Review materials in preparation for with meeting with Debtors (2.1); call with Debtors and Akin team re investigation (.5).	2.60	\$5,135.00
12/19/24	T L HELFRICK	0002	Prepare case status update (.4) and correspondence with client re same (.1); review case documents (.5) and draft correspondence to Akin team re same (.2).	1.20	\$1,194.00
12/19/24	T L HELFRICK	0006	Correspondence with A. Antypas and J. Newdeck re retention matters (.3); correspondence with M. DeBaecke (Ashby) re same (.2).	0.50	\$497.50
12/19/24	T L HELFRICK	0022	Continue reviewing Plan and RSA (1.5); continue drafting Plan summary (2.4); emails with A. Antypas re same (.6).	4.50	\$4,477.50
12/19/24	T WHITNEY	0020	Confer with P. O'Brien re investigation background (.4); review investigation background materials (3.2).	3.60	\$3,330.00
12/20/24	M S STAMER	0020	Correspondence with debtors' professionals (.4) and 1L professionals (.3) re investigation.	0.70	\$1,536.50
12/20/24	M S STAMER	0002	Review correspondence re case documents and recent filings.	0.60	\$1,317.00
12/20/24	M R MORSE	0020	Download and prepare production documents from Wilkie (3.4); prepare report for all productions (.5).	3.90	\$1,891.50
12/20/24	P G O'BRIEN	0020	Call with Akin litigation team re investigation discovery issues.	0.70	\$962.50
12/20/24	J F NEWDECK	0006	Analyze lender PII matters (1.4); call with debtors' counsel (.2) and M. DeBaecke (Ashby) (.3) re same; review prior pleadings related to same (.5); correspondence with debtors re same (.2); analyze approach to same (.3); update Akin retention application for disclosures and interim comments (1.4); correspondence with M. DeBaecke (Ashby) re retention matters (.2); consider same (.2); research re PII matters (.5).	5.20	\$8,580.00
12/20/24	B M KAHN	0006	Initial review of Akin retention application (.7); correspondence with Akin team re: same (.3).	1.00	\$1,975.00
12/20/24	B M KAHN	0020	Analyze investigation discovery	0.70	\$1,382.50

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/20/24	D K KRASA	0006	issues. Review conflicts reports (2.0); analyze data (1.1); research additional company info (1.0); update conflicts review summary chart (.8); draft detailed correspondence to conflicts re follow up question re review (.2); update summary (.3); draft status correspondence to review team (.1).	5.50	\$2,915.00
12/20/24	R TIZRAVESH	0020	Analyze issues re investigation (1.5); correspondence with E-discovery team re document production issues (.5); review and analyze documents for investigation (1.5); call with Akin litigation team re investigation discovery issues (.7).	4.20	\$6,930.00
12/20/24	M L BRIMMAGE JR.	0020	Call with Akin litigation team re investigation discovery issues.	0.70	\$1,536.50
12/20/24	A F ANTYPAS	0006	Review and comment on draft Akin retention application (1.4); review precedent in connection with same (.4); correspond with Akin team re same (.7).	2.50	\$3,487.50
12/20/24	A F ANTYPAS	0022	Review and edit revised draft of plan and RSA summary (1.4); call with T. Helfrick re plan and RSA matters (.8).	2.20	\$3,069.00
12/20/24	A F ANTYPAS	0002	Correspond with T. Helfrick re case matters (.5); review materials in connection with same (.4).	0.90	\$1,255.50
12/20/24	P J GLACKIN	0020	Review documents produced by Debtors in connection with investigation (3.4) and draft analysis re same (1.4); draft summary of production to litigation team (.4); call with Akin litigation team re investigation discovery issues (.7).	5.90	\$7,965.00
12/20/24	A LAARAJ	0006	Analyze reports for conflicts review.	6.30	\$3,339.00
12/20/24	A G STAMBOULIDIS	0020	Call with T. Whitney re document review protocol (.4); review additional background materials (2.0); draft background section of document review protocol (2.1); review document production from debtors to determine relevant custodians (1.0).	5.50	\$4,620.00
12/20/24	A E LUFT	0020	Draft discovery requests (.9); call with Akin litigation team re investigation discovery issues	1.60	\$3,160.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/20/24	T L HELFRICK	0002	(.7). Correspondence with A. Antypas re case matters (.5); review recent filings (.7) and draft correspondence to Akin team re same (.6).	1.80	\$1,791.00
12/20/24	T L HELFRICK	0022	Revise Plan summary (1.3); call with A. Antypas re plan and RSA matters (.8).	2.10	\$2,089.50
12/20/24	T L HELFRICK	0006	Review and comment on draft Akin retention application (2.1); review materials in connection with same (1.0).	3.10	\$3,084.50
12/20/24	T WHITNEY	0020	Call with A. Stamboulidis re document review protocol (.4); draft sections of document review protocol (1.2).	1.60	\$1,480.00
12/21/24	M S STAMER	0020	Correspondence with Akin team re investigation matters.	0.60	\$1,317.00
12/21/24	M R MORSE	0020	Review and comment on content of Willkie productions.	0.40	\$194.00
12/21/24	J F NEWDECK	0006	Analyze PII reports (4.3); update Akin retention application (.3); draft retention application for Delaware counsel (.5); further analyze PII information (.7).	5.80	\$9,570.00
12/21/24	B M KAHN	0022	Review and comment on plan summary for client.	1.30	\$2,567.50
12/21/24	R TIZRAVESH	0020	Draft correspondence to Debtors re investigation requests (1.3); draft correspondence in connection with investigation requests (.6); correspondence with Akin team re investigation issues (.2); correspondence with E-discovery team re document review (.2).	2.30	\$3,795.00
12/21/24	A F ANTYPAS	0022	Review comments to plan summary materials (.3); correspond with T. Helfrick re same (.4); review and comment on revised draft of same (.4).	1.10	\$1,534.50
12/21/24	A G STAMBOULIDIS	0020	Complete draft sections of document review protocol.	2.40	\$2,016.00
12/21/24	T L HELFRICK	0002	Prepare case materials for client.	1.90	\$1,890.50
12/21/24	T L HELFRICK	0022	Revise Plan summary (1.3); emails with A. Antypas re same (.3).	1.60	\$1,592.00
12/21/24	T L HELFRICK	0006	Review retention application.	0.30	\$298.50
12/21/24	T WHITNEY	0020	Review and comment on draft document review protocol sections (1.0); revise same (.6).	1.60	\$1,480.00
12/22/24	P G O'BRIEN	0020	Review and revise draft e-mail re document requests.	0.20	\$275.00
12/22/24	J F NEWDECK	0006	Correspondence with team re PII review.	0.50	\$825.00
12/22/24	D K KRASA	0006	Review J. Newdeck's follow up questions re conflicts review	0.70	\$371.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/22/24	R TIZRAVESH	0020	(.3); prepare follow up questions for submission to conflicts (.2) and correspondence re same (.2). Revise investigation requests (1.2); review documents re investigation (1.7); correspondence with Akin litigation team re investigation issues (.3).	3.20	\$5,280.00
12/22/24	P J GLACKIN	0020	Review internal discovery protocol documents (.5) and email Akin litigation team re document review protocol (.2).	0.70	\$945.00
12/22/24	A G STAMBOULIDIS	0020	Review document review protocol for internal comments.	1.60	\$1,344.00
12/22/24	T L HELFRICK	0002	Correspondence with B. Kahn re client documents.	0.30	\$298.50
12/23/24	B R KEMP	0006	Confer with A. Laaraj re updates to Akin retention schedules.	0.30	\$159.00
12/23/24	J F NEWDECK	0006	Review open issues in connection with Akin and Ashby retention applications.	1.00	\$1,650.00
12/23/24	B M KAHN	0002	Correspondence with T. Helfrick re client documents.	0.20	\$395.00
12/23/24	B M KAHN	0006	Review and comment on draft Akin retention application (1.6); correspondence with Akin team re: same (.3).	1.90	\$3,752.50
12/23/24	D K KRASA	0006	Review responses from conflicts re PII category (.5); review additional conflicts reports (1.2); update conflicts review summary (.6); confer with A. Laaraj re same (.2); review and update Schedule 3 (.6); prepare redline for attorney review (.2); draft correspondence to J. Newdeck and A. Laaraj re status of conflicts review (.2).	3.50	\$1,855.00
12/23/24	R TIZRAVESH	0020	Correspondence with Akin team re investigation issues (.6); revise draft correspondence to Debtors re investigation (.4); review various documents in connection with investigation (1.8).	2.80	\$4,620.00
12/23/24	M L BRIMMAGE JR.	0020	Analyze debtor discovery requests and strategy with respect thereto.	1.00	\$2,195.00
12/23/24	A F ANTYPAS	0006	Correspondence with Akin team re conflicts check and retention matters (.6); review and comment on revised drafts of Akin retention materials (.8).	1.40	\$1,953.00
12/23/24	P J GLACKIN	0020	Call with A. Stamboulidis re document review protocol (.2); review and revise same (.4).	0.60	\$810.00
12/23/24	A LAARAJ	0006	Confer with B. Kemp re updates	7.70	\$4,081.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>	<u>Hours</u>	<u>Value</u>	
12/23/24	A G STAMBOULIDIS	0020	Akin schedules (.3); confer with D. Krasa re conflicts review summary (.2); update retention schedules (.5); review reports and update master summary (6.3); review internal responses re same (.4). Call with P. Glackin re document review protocol (.2); call with T. Whitney to discuss same (.3); finalize first draft of document review protocol (1.5) and revise same to incorporate Akin team comments (3.3).	5.30	\$4,452.00
12/23/24	T L HELFRICK	0002	Prepare and revise case materials for client (1.5); emails with B. Kahn re same (.2); prepare correspondence to client re case updates (.7); review recent filings (.4) and prepare summaries of same (.4).	3.20	\$3,184.00
12/23/24	T L HELFRICK	0006	Revise Akin retention application (1.4) ; correspondence with Willkie team re Akin engagement letter (.2); call with Y. Kass-Gergi (Willkie) re Akin engagement letter (.1); review Willkie team's comments to same (.2) and internal correspondence re same (.2).	2.10	\$2,089.50
12/23/24	T WHITNEY	0020	Review draft document review protocol from A. Stamboulidis (.1); call with A. Stamboulidis re same (.3); review and comment on draft of same (3.1); review updated final draft (.3).	3.80	\$3,515.00
12/24/24	J F NEWDECK	0006	Analyze PII matters (1.4); draft correspondence to B. Kahn re same (.3); further internal communications re same (.3); analyze lender PII issues (.7).	2.70	\$4,455.00
12/24/24	B M KAHN	0006	Review updates re Akin retention application issues.	0.90	\$1,777.50
12/24/24	A LAARAJ	0006	Analyze conflict reports (.8); correspondence to team re same (.2).	1.00	\$530.00
12/24/24	T L HELFRICK	0002	Correspondence with client re case updates.	0.40	\$398.00
12/24/24	T L HELFRICK	0006	Correspondence with Akin team re retention matters.	0.60	\$597.00
12/24/24	T WHITNEY	0020	Review internal correspondence re investigation matters (.3); prepare for document review kick-off call (.2).	0.50	\$462.50
12/25/24	J F NEWDECK	0006	Revise disclosure schedules (1.0); analyze issues re same (.3); update Akin retention	1.80	\$2,970.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/26/24	M S STAMER	0020	application (.3); email M. DeBaecke (Ashby) re retention matters (.2). Call with Akin team and UCC counsel re investigation matters (.6); review internal emails re same (.1).	0.70	\$1,536.50
12/26/24	B R KEMP	0006	Confer with A. Laaraj re conflict review process.	0.30	\$159.00
12/26/24	P G O'BRIEN	0020	Review case documents re investigation background (.4); draft work product in connection with investigation (.5) and review correspondence re investigation meetings and document requests (.3); revise and edit draft document review template (1.0); emails with Akin team re same (.2).	2.40	\$3,300.00
12/26/24	J F NEWDECK	0006	Analyze exhibits and disclosure matters for Akin retention application (1.0); correspondence with Akin team re same (.2); update exhibits/schedules re same (.5); review status of Akin application schedules (.4); correspondence with Akin team re same (.2); review open questions (.3); review update re same (.1).	2.70	\$4,455.00
12/26/24	B M KAHN	0006	Call with Akin and Willkie teams re: engagement letter (.3); follow up internal communications to Akin FR team re same (.4); review revised language re: retention (.3).	1.00	\$1,975.00
12/26/24	B M KAHN	0020	Introductory call with Akin team and UCC counsel re investigation matters (.6); analyze follow up issues in connection with same (.2).	0.80	\$1,580.00
12/26/24	R TIZRAVESH	0020	Review materials and documents in connection with investigation (1.6); attend call with UCC counsel and Akin team re investigation matters (.6); correspondence with litigation team re investigation issues (.6); draft notes re investigation (.5); revise draft correspondence to Debtors re document requests (.4).	3.70	\$6,105.00
12/26/24	M L BRIMMAGE JR.	0020	Review and analyze background materials in advance of UCC call (.4); call with UCC counsel and Akin team re re investigation matters (.6); review and revise	1.40	\$3,073.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/26/24	A F ANTYPAS	0006	debtor discovery requests (.4). Attend call with Akin and Willkie teams re Akin engagement letter (.3); review revised draft of same (.4); correspondence with Akin team re same (.5).	1.20	\$1,674.00
12/26/24	P J GLACKIN	0020	Review and revise document review protocol (1.6) and correspondence with Akin litigation team re the same (.3); confer with T. Whitney re same (.2); review discovery documents re investigation (.5).	2.60	\$3,510.00
12/26/24	A LAARAJ	0006	Confer with B. Kemp re conflict review (.3); update schedules 1 and 2 (.5) and the master summary excel for NOAs and 2019 parties (2.3); review docket for same (.9); email conflicts team re reports for same (.3).	4.30	\$2,279.00
12/26/24	A E LUFT	0006	Call with Akin and Willkie teams re engagement letter (.3) and follow-up internal emails re same (.1).	0.40	\$790.00
12/26/24	A E LUFT	0020	Call with UCC counsel and Akin team re investigation matters.	0.60	\$1,185.00
12/26/24	T L HELFRICK	0006	Attend call with Akin and Willkie teams re Akin engagement letter (.3); revise proposed Akin retention order (1.1) and engagement letter (.3); correspondence with Akin FR team re same (.7); review revised order (.2) and correspondence with Akin team re same (.3).	2.90	\$2,885.50
12/26/24	T L HELFRICK	0003	Draft internal billing memorandum (.3) and correspondence to Akin team re same (.3).	0.60	\$597.00
12/26/24	T L HELFRICK	0002	Correspondence with client re case updates.	0.40	\$398.00
12/26/24	T L HELFRICK	0033	Revise Freedom Lenders' appeals timeline (.8) and email A. Antypas re same (.2).	1.00	\$995.00
12/26/24	T WHITNEY	0020	Confer with P. Glackin re document review protocol (.2); review comments and revisions to document review protocol (.3); analyze issues re same (.5).	1.00	\$925.00
12/27/24	M S STAMER	0020	Call with first lien professionals in connection with investigation.	0.60	\$1,317.00
12/27/24	M R MORSE	0020	Implement requested modifications to production review layout (.7); batch out all documents in workspace (.4).	1.10	\$533.50
12/27/24	P G O'BRIEN	0020	Revise draft work product in	0.70	\$962.50

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/27/24	B M KAHN	0020	connection with investigation (.3); review internal revisions to same (.2); review summary of discussion with 1L counsel (.2). Correspondence with Akin team re: status of investigation matters (.2); review summary of 1L AHG call (.2).	0.40	\$790.00
12/27/24	R TIZRAVESH	0020	Revise draft document review memo re investigation (1.2); call with Paul Hastings and Akin teams re investigation issues (.6); revise draft notes re investigation (.8); revise and analyze draft investigation outline (.9); correspondence with Akin team re investigation issues (1.2).	4.70	\$7,755.00
12/27/24	M L BRIMMAGE JR.	0020	Review materials in preparation for call with 1L AHG counsel (.5); call with Akin and Paul Hastings teams re investigation issues (.6); analyze issues re debtor discovery requests and evaluate strategy re same (.4); review and comment on work product in connection with investigation (.3).	1.80	\$3,951.00
12/27/24	A F ANTYPAS	0006	Correspond with Akin FR team re conflict and retention matters.	0.50	\$697.50
12/27/24	A F ANTYPAS	0020	Prepare for (.2) and attend call with Akin and Paul Hastings teams re investigation issues (.6).	0.80	\$1,116.00
12/27/24	A F ANTYPAS	0002	Correspond with client and T. Helfrick re case status updates (.3); draft correspondence to B. Kahn re same (.4).	0.70	\$976.50
12/27/24	P J GLACKIN	0020	Call with T. Whitney and A. Stamboulidis re document review (.3); revise document review protocol (.3) and email document review team re same (.2); review documents re prepetition transactions (.4); correspondence with Akin team re same (.1).	1.30	\$1,755.00
12/27/24	A LAARAJ	0006	Review PII conflicts reports (3.7) and update schedules re same (.4); respond to internal correspondence re same (.3).	4.40	\$2,332.00
12/27/24	A G STAMBOULIDIS	0020	Correspondence with Akin E-Discovery team re document review (.5); call with P. Glackin and T. Whitney re document review (.3); review debtors' production (1.0); draft work product in connection with	3.10	\$2,604.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/27/24	M ADABI	0020	investigation (1.3). Analyze document review protocol to assist with next steps and upcoming document review efforts.	0.70	\$840.00
12/27/24	A E LUFT	0020	Call with 1L AHG counsel re: issues in case (.6) and internal follow-up emails re same (.1).	0.70	\$1,382.50
12/27/24	T L HELFRICK	0002	Correspondence with A. Antypas and M. Wartell re case status updates (.5); review recent filings (.5) and review internal correspondence re same (.2).	1.20	\$1,194.00
12/27/24	T WHITNEY	0020	Implement internal comments to document review protocol (.9); call with P. Glackin and A. Stamboulidis re document review (.3); review draft work product and underlying documents (.5); review Relativity issues (.2); conduct document review (2.6).	4.50	\$4,162.50
12/28/24	J F NEWDECK	0006	Correspondence with Akin FR team re Akin proposed retention order (.3); review revisions to same (.5).	0.80	\$1,320.00
12/28/24	A F ANTYPAS	0006	Review and comment on revised draft of Akin retention application and order (1.0); correspond with Akin team re same (.9); review Akin engagement letter in connection with same (.2).	2.10	\$2,929.50
12/28/24	A G STAMBOULIDIS	0020	Review documents in connection with investigation (1.7); draft summary of responsive documents in connection with same (1.7).	3.40	\$2,856.00
12/28/24	T L HELFRICK	0006	Revise Akin retention application (1.0); review engagement letter in connection with same (.6).	1.60	\$1,592.00
12/28/24	T WHITNEY	0020	Review and analyze documents received in connection with investigation.	1.00	\$925.00
12/29/24	P G O'BRIEN	0020	Review and analyze documents in support of investigation.	1.50	\$2,062.50
12/29/24	J F NEWDECK	0006	Analyze PII reports re disclosures.	1.10	\$1,815.00
12/29/24	B M KAHN	0006	Comment on proposed Akin retention order (.3) and retention related matters (.3).	0.60	\$1,185.00
12/29/24	A F ANTYPAS	0006	Review and comment on Akin retention application and proposed order (.5); correspond with Akin team re same (.3).	0.80	\$1,116.00
12/29/24	P J GLACKIN	0020	Prepare for document review call (.4); review documents and	1.20	\$1,620.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/29/24	T B SCHNEIDER	0020	draft summaries re same (.8). Draft correspondence to legal team re first level document review (.3); review protocol for first level document review (.5).	0.80	\$672.00
12/29/24	A G STAMBOULIDIS	0020	Review documents in connection with investigation (1.3); draft summary of responsive documents in connection with same (1.3).	2.60	\$2,184.00
12/29/24	T L HELFRICK	0006	Revise Akin retention application (.4) and correspondence with Akin team re same (.2).	0.60	\$597.00
12/29/24	T WHITNEY	0020	Review and analyze documents received in connection with investigation.	0.90	\$832.50
12/30/24	S B KUHN	0031	Draft correspondence to Akin team re bid deadline.	0.20	\$439.00
12/30/24	P G O'BRIEN	0020	Call with debtors' counsel and Akin team re document collection and document search (.5); communications with Akin team re workstream updates (.4); confer with Akin doc review team re review project (.4); review and analyze documents re special committee investigation (1.9); review potential claims (.2); emails with R. Tizravesh re same (.1).	3.50	\$4,812.50
12/30/24	J F NEWDECK	0006	Draft correspondence to team re disclosures (.2); draft correspondence to M. DeBaecke (Ashby) re Ashby retention application (.2); correspondence with Akin team re schedules for Akin retention application (.1).	0.50	\$825.00
12/30/24	B M KAHN	0006	Review updates re Akin retention application matters.	0.50	\$987.50
12/30/24	B M KAHN	0022	Initial review of DS exhibits (liquidation analysis and financial projections).	0.80	\$1,580.00
12/30/24	R TIZRAVESH	0020	Draft notes re investigation strategy (1.2); call with Debtors and Akin team re investigation discovery (.5); draft litigation investigation task updates (.3); attend internal litigation team call (.4); call with Debtors re investigation issues (.2); review and analyze documents for investigation (3.2); emails with P. O'Brien re same (.3).	6.10	\$10,065.00
12/30/24	M L BRIMMAGE JR.	0020	Prepare for call with debtors re investigation matters (.6); participate in call with Akin team and debtors' counsel re	3.70	\$8,121.50

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>	<u>Hours</u>	<u>Value</u>	
12/30/24	P J GLACKIN	0020	investigation discovery requests (.5); analyze issues related to investigation and claims analysis (1.0); analyze debtor discovery issues in support of investigation and claims analysis (.8); analyze materials to prepare for internal team call (.4); participate in same (.4).	3.60	\$4,860.00
12/30/24	A LAARAJ	0006	Call with S. Raggio re document review issues and protocol (.2); call with debtors' counsel and Akin team re document production issues and related issues (.5); call with document review team re review protocol and issues (.4); review discovery documents and draft summaries of same (2.5).	4.40	\$2,332.00
12/30/24	T B SCHNEIDER	0020	Review updated reports and update master summary excel re related entities (2.3); gather NOAs, 2019 Statements, Verified Statements for T. Helfrick (.8); review same for retention schedules (.5); draft correspondence to conflicts re PII review (.8).	4.00	\$3,360.00
12/30/24	A G STAMBOULIDIS	0020	Conduct first level review of documents (2.6); prepare summary of first level review of documents (1.0); attend kick-off call with Akin Lit team re document review (.4).	6.50	\$5,460.00
12/30/24	M ADABI	0020	Proofread and finalize investigation work product (.7); review document review protocol (.4); attend Akin litigation team document review kick-off call (.4); revise work product in connection with investigation (1.2); implement internal edits in connection with same (.4); review documents in connection with investigation (3.4).	7.10	\$8,520.00
12/30/24	A E LUFT	0020	Participate in document review kickoff call (.4); conduct first-level review of documents (4.1); update review based on updated review protocol instructions (1.2); analyze first-level review protocol (1.4).	1.20	\$2,370.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/30/24	T L HELFRICK	0002	Draft and revise working group list (1.6); review recent reporting (.2) and draft correspondence to team re same (.1).	1.90	\$1,890.50
12/30/24	T L HELFRICK	0006	Correspondence with Akin team re schedules and retention matters.	0.40	\$398.00
12/30/24	T L HELFRICK	0022	Review liquidation analysis and financial projections.	0.30	\$298.50
12/30/24	T WHITNEY	0020	Review draft work product re investigation (.3); attend Akin Lit team document review kick-off call (.4); correspondence with team re document review (.3); conduct document review (4.0).	5.00	\$4,625.00
12/31/24	J F NEWDECK	0006	Correspondence with Akin team re status of retention application and outstanding issues (.2); correspondence with paralegal review team re same (.2).	0.40	\$660.00
12/31/24	B M KAHN	0006	Review comments to draft Akin engagement letter (.2); emails with Akin FR team re: retention application matters (1.0).	1.20	\$2,370.00
12/31/24	M L BRIMMAGE JR.	0020	Review debtors' discovery in connection with investigation (.3) and analyze potential claims in connection therewith (.7).	1.00	\$2,195.00
12/31/24	A F ANTYPAS	0006	Correspond with Akin team re status of Akin engagement letter (.3); review and edit revised draft of same (.4).	0.70	\$976.50
12/31/24	P J GLACKIN	0020	Review discovery documents from debtors re potential estate claims (.8) and correspondence with litigation team re same (.3).	1.10	\$1,485.00
12/31/24	A LAARAJ	0006	Conduct conflicts review of redacted names (2.2); review and respond to internal correspondence re conflicts review status and updates (.4).	2.60	\$1,378.00
12/31/24	T B SCHNEIDER	0020	Review document review protocol for ongoing first level review (2.3); conduct first level review of documents (4.5).	6.80	\$5,712.00
12/31/24	A G STAMBOULIDIS	0020	Review documents in connection with investigation (.6); revise work product re same (.7); review documents in connection with investigation (1.5); draft summary of responsive documents in connection with same (1.3).	4.10	\$3,444.00
12/31/24	M ADABI	0020	Prepare summary of first-level review for the two review batches completed (3.4); conduct first-level review of documents	8.90	\$10,680.00

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<u>Date</u>	<u>Tkpr</u>	<u>Task</u>		<u>Hours</u>	<u>Value</u>
12/31/24	T L HELFRICK	0006	and prepare summaries of review efforts for the same (5.5). Review and comment on draft Ashby retention application (2.1); review updates on retention applications and disclosure schedules (.4); revise engagement letter (.3).	2.80	\$2,786.00
12/31/24	T L HELFRICK	0002	Prepare correspondence to client re case status (.3); review docket updates (.2).	0.50	\$497.50
12/31/24	T WHITNEY	0020	Review and analyze documents received in connection with investigation.	3.00	\$2,775.00
Total Hours					626

TIMEKEEPER TIME SUMMARY:

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
M S STAMER	33.50	\$2195.00	= \$73,532.50
S B KUHN	14.80	\$2195.00	= \$32,486.00
B M KAHN	38.60	\$1975.00	= \$76,235.00
M L BRIMMAGE JR.	19.10	\$2195.00	= \$41,924.50
A E LUFT	48.80	\$1975.00	= \$96,380.00
P G O'BRIEN	10.00	\$1375.00	= \$13,750.00
J F NEWDECK	48.60	\$1650.00	= \$80,190.00
R TIZRAVESH	48.60	\$1650.00	= \$80,190.00
A F ANTYPAS	49.30	\$1395.00	= \$68,773.50
P J GLACKIN	27.00	\$1350.00	= \$36,450.00
T B SCHNEIDER	11.60	\$840.00	= \$9,744.00
A G STAMBOULIDIS	36.20	\$840.00	= \$30,408.00
M ADABI	16.70	\$1200.00	= \$20,040.00
T L HELFRICK	99.40	\$995.00	= \$98,903.00
T WHITNEY	26.50	\$925.00	= \$24,512.50
B R KEMP	5.30	\$530.00	= \$2,809.00
D K KRASA	21.80	\$530.00	= \$11,554.00
A LAARAJ	55.80	\$530.00	= \$29,574.00
M N TANNA	5.70	\$305.00	= \$1,738.50
M R MORSE	8.70	\$485.00	= \$4,219.50

Current Fees	\$833,414.00
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FOR COSTS ADVANCED AND EXPENSES INCURRED:

Court Cost	\$622.05
Meals - Business	\$36.29
Local Transportation - Overtime	\$50.00

Current Expenses	\$708.34
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<u>Date</u>		<u>Value</u>
12/10/24	Meals - Business VENDOR: AVI E. LUFT INVOICE#: 7159632601142305 DATE: 1/14/2025 Other Food and Beverages, 12/10/24, Beverage and snacks re: court hearing in Delaware., Faber Store #1378 - Amtrak	\$16.29

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	Wilmington, Avi Luft	
12/17/24	Meals - Business VENDOR: AVI E. LUFT INVOICE#: 7159632601142305 DATE: 1/14/2025 Lunch, 12/17/24, Lunch re: court hearing in Delaware., Al Chu's Sushi, Avi Luft	\$20.00
12/18/24	Local Transportation - Overtime VENDOR: DAGMARA K. KRASA INVOICE#: 7140371701102201 DATE: 1/10/2025 Working Late in Office Taxi/Car/etc, 12/18/24, Car home after working overtime in the office., Lyft	\$50.00
12/19/24	Court Cost VENDOR: RELIABLE WILMINGTON / RELIABLE INVOICE#: WL120919 DATE: 12/19/2024 Transcription services for Franchise Group	\$523.45
12/23/24	Court Cost VENDOR: RELIABLE WILMINGTON / RELIABLE INVOICE#: WL120987 DATE: 12/23/2024 Transcription Services	\$98.60
	Current Expenses	\$708.34
	Total Amount of This Invoice	\$834,122.34

REMITTANCE COPY**Return with Payment**

MICHAEL J. WARELL
 909 THIRD AVENUE
 30TH FLOOR
 NEW YORK, NY 10022

Invoice Number 2138436
 Invoice Date 02/28/25
 Client Number 109258
 Matter Number 0001

FED I.D. NO. 75-1338644

Payment Types	Details
WIRE/ACH	AKIN GUMP STRAUSS HAUER & FELD LLP Citi Private Bank 1101 Pennsylvania Avenue, NW Suite 900 Washington, DC 20004 Account #: 9250397941 ABA# 254070116 Ref: 109258/0001, Invoice No. 2138436 (For wires originating outside the US reference Swift ID# CITIUS33))
POSTAL MAIL	AKIN GUMP STRAUSS HAUER & FELD LLP Mail Code 6838 PO Box 7247 Philadelphia, PA 19170-6838
OVERNIGHT COURIER	REMITCO Akin Gump Strauss - 6838 400 White Clay Center Drive Newark, DE 19711
ONLINE PAYMENT	You can now pay your invoices online via real-time bank payments, credit cards or in installments: https://paywithtranch.com/akin

Please email your remittance details to usremittance@akingump.com for all payments.